

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE:)	
)	Chapter 11
BEAR ISLAND PAPER COMPANY, L.L.C., ¹)	
)	CASE NO. 10-31202-DOT
Debtor.)	
)	

MOTION TO ADMIT PRO HAC VICE

Robert H. Chappell, III, Esq. moves this Court for an Order authorizing certain attorneys from the law firm of Latham & Watkins, LLP to appear and represent Credit Suisse AG *pro hac vice* in the above-styled bankruptcy case and any related adversary litigation. The attorneys for which admission *pro hac vice* is requested are Keith A. Simon, Esq. (“Mr. Simon”) and Adam J. Goldberg, Esq. (“Mr. Goldberg”) (together, the “Admittees”). In support of this motion, I state as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with the Admittees in this matter. My business address and bar number are as follows:

¹ The last four digits of the Debtor’s federal tax identification number are 0914. The principal address for the Debtor is 10026 Old Ridge Road, Ashland, Virginia 23005.

David Heller, Esquire (*pro hac vice* pending)
Keith A. Simon, Esquire (*pro hac vice* pending)
Adam J. Goldberg, Esquire (*pro hac vice* pending)
Latham & Watkins LLP
885 Third Avenue
New York, New York 10022
Phone: (212) 906-1200
Fax: (212) 751-4864

Co-Counsel for Credit Suisse AG

Robert H. Chappell, III, Esquire (VSB #31698)
Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Erin E. Kessel, Esquire (VSB #65360)
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000
Fax: (804) 697-2100

Co-Counsel for Credit Suisse AG

Robert H. Chappell, III (VSB #31698)
Spotts Fain PC
411 E. Franklin Street, Suite 600
Richmond, VA 23219

2. Mr. Simon is a member in good standing of the Bar of the State of New York, the state of his residence, as well as the Bar of the State of Illinois, and is admitted to practice before the United States District Court for the Southern District of New York.

3. Mr. Goldberg is a member in good standing of the Bar of the State of New York, the state of his residence, and is admitted to practice before the United States District Court for the Southern District of New York.

4. Each of the Admittees has the following business address:

Latham & Watkins LLP
885 Third Avenue
New York, NY 10022-4834

5. Neither of the Admittees has been the subject of disciplinary action by the bar or courts of the State of New York, or any other state or any federal court.

6. Neither of the Admittees has been denied admission to the courts of any state or to any federal court.

7. Each of the Admittees has completed an Application To Qualify As A Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), copies of which are attached as **Exhibit A**.

8. A proposed Order granting this Motion is being submitted to the Court contemporaneously with the filing of this Motion.

WHEREFORE, Robert H. Chappell, III prays that this Court grant his Motion to permit the Admittees to represent Credit Suisse AG *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

/s/ Robert H. Chappell, III

Robert H. Chappell, III, Esquire (VSB #31698)
Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Erin E. Kessel, Esquire (VSB #65360)
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000
Fax: (804) 697-2100
Co-Counsel for Credit Suisse AG

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2010, a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid or electronic means through the Court's ECF system or through email on the following, constituting all necessary parties:

Robert B. Van Arsdale, Esq.
Office of the U. S. Trustee
701 E. Broad St., Suite 4304
Richmond, VA 23219
Robert.b.van.arsdale@usdoj.gov

Attn: Jay Epstein
White Birch Paper Company
80 Field Point Road
Greenwich, Connecticut 06830

Christopher J. Marcus, Esq.
Kirkland & Ellis LLP
601 Lexington Avenue
New York, NY 10022-4611
christopher.marcus@kirkland.com

Jonathan L. Hauser, Esq.
Troutman Sanders LLP
22 Central Park Avenue, Suite 2000
P.O. Box 61185
Virginia Beach, VA 23466-1185
Jonathan.hauser@troutmansanders.com

Angela L. Batterson, Esq.
King & Spalding
1185 Avenue of Americas
New York, NY 10036-4003
abatterson@kslaw.com

Benjamin B. Iselin, Esq.
McGuire Woods LLP
1345 Avenue of the Americas, 7th Floor
New York, NY 10105-0106
biselin@mcguirewoods.com

Scott D. Talmadge, Esq.
Kaye Scholer LLP
425 Park Avenue
New York, NY 10022-3598
stalmadge@kayescholer.com

/s/ Robert H. Chappell, III